

July 5, 2017

VIA ECF

The Honorable Joan M. Azrack
United States District Judge
United States District Court Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Angela Dixon v. Ford Motor Company*, 2:14-CV-06135 (E.D.N.Y.)

Your Honor:

Plaintiff Angela Dixon (“Plaintiff”), and Defendant Ford Motor Company (“Ford”), submit this joint status report to advise as to the progress of the nationwide settlement in in *Sanchez-Knutson v. Ford Motor Company*, United States District Court for the Southern District of Florida, Case No. 14-cv-61344 WPD (“*Sanchez-Knutson*”).

As reported in the Joint Status Reports filed January 3, 2017, March 6, 2017, and May 5, 2017, the *Sanchez-Knutson* court entered a Preliminary Approval Order on November 21, 2016, granting preliminary approval of the settlement, and setting the following schedule:

- **Mailed Notice.** Defendant shall complete dissemination of Class Notice on or before ***March 24, 2017***.
- **Fairness Hearing.** The Fairness Hearing is scheduled on ***June 14, 2017***.
- **Class Counsel’s Motion for Final Approval/Fee and Expense/Service Award Application.** Class Counsel will submit a Motion for Final Approval of the proposed Settlement and for approval of their Fee and Expense Application and Application for a Service Award to the Named Plaintiff and Unnamed Plaintiffs by ***May 3, 2017***.
- **Requests for Exclusion.** All Requests for Exclusion from the Settlement Class must be submitted on or before ***May 17, 2017***.
- **Objections.** All objections to the Settlement shall be filed with the Court and served upon Class Counsel and Defendant’s counsel on or before ***May 17, 2017***.
- **List of Exclusions/Response to Objections.** Ford shall report the names and addresses of all Settlement Class Members who have requested exclusion from the Settlement Class no less than seven days before the Fairness Hearing. The parties also shall file any supplemental briefs responding to objections no less than seven days before the Fairness Hearing.

Plaintiffs and Ford also advise that the Motion to Intervene filed in the *Sanchez-Knutson* matter on October 6, 2016 by an Illinois resident was heard at the November 17, 2016 hearing. During the hearing, the *Sanchez-Knutson* court orally denied the Motion to Intervene, and on November 21, 2016 the court entered an order denying the Motion to Intervene.

Since entry of the Preliminary Approval Order on November 21, 2016, the *Sanchez-Knutson* parties have been working on the issuance of notice. Defendant has selected KCC to disseminate class notice (including setting up the website) and serve as claims administrator, and Defendant has been working with KCC on these tasks.

Defendant has also issued a new Technical Service Bulletin which sets forth the repair procedure which is available to Settlement Class Members to address the exhaust odor issue if it occurs.

On February 17, 2017, the *Sanchez-Knutson* parties filed a Joint Motion for Preliminary Approval of Amendment to Settlement Agreement and Class Notices. These amendments were requested because (1) updated information has come to light since the Settlement was negotiated that justify increasing Ford's reimbursement of Out-of-Pocket-Expenses for an Exhaust Odor Repair from \$125 to \$175; and (2) the Settlement Administrator, based on its expertise in administering large class settlements, has proposed certain technical and ministerial changes to the Short Form Class Notice and Long Form Class Notice to promote clarity. On February 21, 2017, the *Sanchez-Knutson* court entered an Order granting the Joint Motion for Preliminary Approval of Amendment to Settlement Agreement and Class Notices.

On March 1, 2017 the *Sanchez-Knutson* parties filed a Joint Motion to Amend Short Form Class Notice. This motion asked the court to approve a revised version of the Short Form Class Notice that more clearly describes the availability of a new Technical Service Bulletin to address exhaust odor. On March 2, 2017, the *Sanchez-Knutson* court entered an Order granting the Joint Motion to Amend Short Form Class Notice.

On March 18, 2017, the settlement website was activated; that website contains various information including the Long Form Class Notice of the settlement. On March 24, 2017 the Short Form Class Notice was delivered First Class Mail, postage prepaid, to the Settlement Class.

On May 3, 2017, Class Counsel submitted a Motion for Class Representative Service Awards and Class Counsel's Application for Attorneys' Fees and Expenses.

On June 7, 2017, Ford submitted its report the names and addresses of all Settlement Class Members who have requested exclusion from the Settlement Class. Also on June 7, 2017, Class Counsel submitted the Plaintiff's Motion for Final Approval of Nationwide Settlement, and Ford submitted its Memorandum in Support of Plaintiff's Motion for Final Approval of Nationwide Settlement.

On June 14, 2017 the *Sanchez-Knutson* court held a hearing on the Motion for Final Approval of Nationwide Settlement, and took the matter under advisement.

On June 21, 2017 the *Sanchez-Knutson* court entered a Final Order and Judgment which gave final approval to the Settlement Agreement. The *Sanchez-Knutson* court also entered an order granting Class Counsels' Motion for Fees and Costs.

On June 28, 2017, an objecting member of the certified settlement class in *Sanchez-Knutson* posted an appellate cost bond.

Respectfully submitted,

/s/ Steven Sachs

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